

# MMP&S

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January 4, 2025

**VIA ECF**

Hon. Kenneth M. Karas  
United States Courthouse for the Southern District of New York  
300 Quarropas Street, Courtroom 533  
White Plains, New York 10601-4150

Re: *Raymond Canario v. The County of Rockland, Hon. Thomas E. Walsh II, et al.*  
Docket No.: 7:24-CV-04470 (KMK)

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Dear Judge Karas:

Please be advised that we represent the County of Rockland ("the County") in the above-referenced action. This correspondence is submitted jointly with counsel for Defendants Thomas Walsh II, Patrick Frawley, Michael Duganzic, and Matthew Wohl ("the Individual Defendants")<sup>1</sup>

The Defendants' Reply papers are due to be filed on February 6, 2025. We are writing to respectfully request that the Court allow the filing of our Reply Memoranda of Law with redactions as to the portions that refer to the names of the grand jury witnesses and the substance of their testimony.

We also request permission to file the following responsive exhibits under seal:

- 1.) Plaintiff's omnibus motion to dismiss the indictment in the underlying criminal prosecution.
- 2.) The District Attorney's Office's opposition to said motion and Exhibits.
- 3.) Plaintiff's Reply submitted in further support of the omnibus motion to dismiss, including exhibits and documents incorporated therein.
- 4.) The District Attorney's Office's Sur-Reply.

We would, of course, provide the Court and the parties with unredacted copies of all documents. We only propose sealing and redacting the publicly-filed copies.

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<sup>1</sup> Defendants Walker and Sweeney have not been served, but the arguments in this letter apply equally to them.

Earlier this afternoon, I e-mailed other parties as to this issue. Plaintiff consented to the filing under seal/redacting. The Town of Clarkstown has not responded to our email.

Thank you for your consideration.

Respectfully submitted,



Lorin A. Donnelly

cc: **VIA ECF**

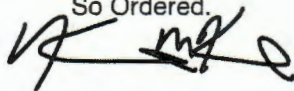
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Granted.

So Ordered.



2/4/25